

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LESTER LEE,

Pro Se Plaintiff

v.

Case No. 8:24-cv-01205-ABA

BROOKSIDE PARK CONDOMINIUM, INC.,

METROPOLIS (MCM, INC.),

RAMMY AZOULAY, and

LAMONT SAVOY,

.Defendants

Declaration in Support of Request for Sanctions, Costs, and Equitable Relief

I, Lester Lee, declare under penalty of perjury that the following statements are true and based on my personal knowledge:

I am the Plaintiff in the above-captioned case. I am a disabled veteran representing myself pro se in this matter because I cannot afford an attorney. While I am held to the same standards of the Federal Rules of Civil Procedure, I do so without the benefit of legal training, clerical support, or resources. This imposes a

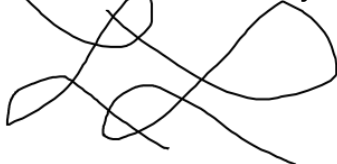
disproportionate burden on me as a disabled litigant, a hardship that federal law recognizes. See, e.g., 42 U.S.C. § 12132 (Title II of the ADA, prohibiting exclusion from public services—including courts—on the basis of disability) and 24 C.F.R. § 8.4 (requiring reasonable accommodations in federally-assisted programs, including courts, to ensure access for individuals with disabilities).

Defendants have repeatedly taken advantage of my pro se status by filing abusive, duplicative, and misleading discovery requests, exceeding the numerical limits set by Rule 33, and omitting or withholding key evidence while distorting the procedural record.

I respectfully ask the Court to recognize the extraordinary efforts I have made under adverse conditions, and to consider sanctions or cost-shifting measures to prevent further abuse.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of July, 2025.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Lester Lee, Plaintiff Pro Se